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Richard Moos, Ph.D.
CH2M Hill, Inc.
Box 22508
Denver, Colorado 80222

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Dear Dr. Moos:

The Environmental Protection Agency (EPA) has reviewed the draft Technical Memorandum on the "Water Quality of Groundwater in the Galena Area". The Agency would have preferred the document to include the entire site, but understands that there is little data on the ground water site-wide currently and that more data will become available this summer. The following comments should be incorporated into the final document on Galena ground water.

1. Page 1, paragraph 3 - The third sentence needs to be modified to avoid confusion of which Galena is being discussed, the mineral or the area. The following is recommended: "Production in Galena peaked...". Is the last sentence documented, did the early mining involve "dewatering" and "producing enough good quality ground water"? Do not state it unless it is documented. A figure is needed to show the Picher district, Galena, Joplin and Granny.
2. Page 2, paragraph 1 - Are you sure the mining caused new "fractures" and that the mines were "commonly connected"? Rephrase the statements, if appropriate.
3. Page 2, paragraph 4 - Do the estimates of ore production include both the original mining and the reprocessing? This should be considered. The document should acknowledge that not all of the 72,000 tons of sphalerite remain because alot of chat has been removed from the site and used for purposes other than ore recovery.
4. Page 4, Public health Water Quality Exceedances - The document should include a figure showing the distribution of the contaminated private wells along with the wells that were uncontaminated. We would like to show how the contaminated wells are scattered among uncontaminated wells so that it is difficult to predict where the contamination is located.
5. Page 7, last paragraph - EPA never stated that the water treatment units on the private wells were an "interim solution". The sentence should be revised as follows: "The EPA has equipped some wells of private owners with a filter to remove metals from drinking water."

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- b. Page 3, third full paragraph - The paragraph states that it is not possible to estimate the costs of the remedial actions without specific goals and objectives/criteria. The purpose of the document, in addition to explaining the degree of hazard, is to give an estimate of the cost to clean up the ground water to the maximum criteria and standards, i.e., MCLs and AMD. We are not looking for an accurate estimate for this site, but a "ball-park" figure. This should be based on estimates from other sites such as Iron Mountain Mine (IMM). For IMM, there are cost estimates for treating 4,000 gpm of AMD. Other estimates from the IMM feasibility study may be used.

The above comments should be incorporated into the final document. Twenty-four copies of the final document should be transmitted to me. Please contact me if you have any questions.

Sincerely, yours,

Alice C. Fuerst
Remedial Section
Superfund Branch
Waste Management Division

